



**MRID
NUMBER**

NR9435799

RICHARD J. OTTEN
Registration and Regulatory Services

December 1, 1992

Ms. Denise Greenway
Special Review and Reregistration Division H7508C
EPA Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

RE: Phase 3 Response Worksheet
Potassium peroxymonosulfate (KPMS)
Case 4072; Chemical 63604
As Contained in EPA Reg. No. 62432-1

Dear Ms. Greenway:

Attached please find one copy of the Response cited above, revised to show:

- (1) Antec International replaced A.H. Robins as the registrant;
- (2) I am designated the U.S. Agent of Record for Antec;
- (3) A new EPA Reg. No. was assigned to the end use product containing KPMS as the active ingredient; and
- (4) Identifying KPMS as a pesticide active ingredient as defined in FIFRA is no longer questioned.

Based on my recent telephone conversation with you, I understand that regarding the remaining issue raised in the A.H. Robins submission, i.e. that KPMS is stable only as a "triple salt" but is not so named as the "active ingredient" to be reregistered, EPA will concur that any new data required by EPA for reregistration may be developed on the triple salt, not on KPMS alone. We appreciate your efforts to establish this agreement now rather than waiting until after data is developed, submitted and reviewed by EPA.

Please note that no MRID numbers or summaries are included in the attached as were in the A.H. Robins response. Following our further review and after talking with Mr. Spurling of EPA's Phase 3 Response Team, we plan to submit three copies of reformatted data to the Document Processing Desk requesting that MRID numbers be assigned to the individual studies. Most of the newer toxicity data had not been submitted to EPA previously and some of the older MRID numbers supplied to me were not accurate. Therefore, it is not appropriate to reference nor summarize these data as was commonly done with Phase 3 Responses on other active ingredients being reregistered where data cited was clearly submitted previously.

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5116 Wood Valley Drive, Raleigh, NC 27613 Office (919) 846-7860 Telefax (919) 846-2775

Ms. Denise Greenway
December 1, 1992
Page 2

We recognize that because of the recent history of change between Robins and Antec that this submission and EPA's reviews may be out of sync with other compounds within your responsibility. We will be pleased to meet with you or discuss actions needed to get this project back on schedule. Please contact me at 919-846-7860.

Sincerely,

R. J. Otten
Richard J. Otten
U.S. Agent of Record
Antec International

RJO/dgm

Enclosure

NOV 19 1992